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*In his individual capacity and for
Patenaude & Felix, APC*

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

ESTHER HOFFMAN; SARAH
DOUGLASS; ANTHONY KIM; and IL
KIM and DARIA KIM, husband and wife
and the marital community comprised
thereof, on behalf of themselves and all
others similarly situated,

Plaintiffs,

vs.

TRANSWORLD SYSTEMS
INCORPORATED; PATENAUE AND
FELIX, APC; MATTHEW CHEUNG
and the marital community comprised of
MATTHEW CHEUNG and JANE DOE
CHEUNG; and DOES ONE THROUGH
TEN,

Defendants.

Case No.:

NOTICE OF REMOVAL OF ACTION
UNDER 28 U.S.C. § 1441(a)
[FEDERAL QUESTION]

1 TO THE CLERK OF THE ABOVE-ENTITLED COURT:

2 PLEASE TAKE NOTICE THAT defendants Transworld Systems Inc. (“TSI”),
3 Patenaude & Felix, APC (“P&F”), and Matthew Cheung (collectively “Defendants”)
4 hereby jointly remove to this Court the state court action described below.

5 1. This action is a civil action of which this Court has original jurisdiction
6 under 28 U.S.C. § 1331 and is one which may be removed to this Court by Defendants
7 pursuant to the provisions of 28 U.S.C. § 1441(a) in that it arises under the Fair Debt
8 Collections Practices Act, 15 U.S.C. § 1692, *et. seq.*

9 2. This action was filed in King County Superior Court and is entitled,
10 *Esther Hoffman, et al. v. Transworld Systems Inc., et al.* Case No. 18-2-15483-9 SEA
11 (the “State Court Action”). A copy of the First Amended Complaint (“FAC”), together
12 with the FAC’s Summons, is attached hereto as Exhibit A.

13 2. Defendant TSI first received notice of the State Court Action on July 27,
14 2018, when TSI’s agent for service of process was served with a copy of the FAC,
15 together with the Summons. Thus, pursuant to 28 U.S.C. § 1446(b), Defendants have
16 timely filed this Notice of Removal.

17 4. A copy of this Notice of Removal is being served upon Plaintiffs and will
18 be filed in the State Court Action.

19 5. The State Court Action is located within the Western District of
20 Washington. Therefore, venue for purposes of removal is proper because the United
21 States District Court for the Western District of Washington embraces the place in
22 which the removed action was pending 28 U.S.C. § 1441(a).

23 6. Removal of the State Court Action is therefore proper under 28 U.S.C.
24 §§ 1441 and 1446.

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1 Dated: 8/2/2018

SESSIONS, FISHMAN, NATHAN & ISRAEL, L.L.P.

2 /s/Damian P. Richard

3 Damian P. Richard

4 Attorney for Defendant

Transworld Systems Inc.

5
6 Dated: 8/2/2018

PATENAUDE & FELIX, APC

7 /s/Matthew Cheung

8 Matthew Cheung

9 Attorney for Defendants

Matthew Cheung and

Patenaude & Felix, APC